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Attorneys for Defendant
JONATHAN L. McDONALD

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	NO. CR-S-04-0460 EJG
)	
Plaintiff,)	
)	STIPULATION AND ORDER TEMPORARILY
v.)	RELEASING DEFENDANT
)	
JONATHAN L. McDONALD,)	
)	
Defendant.)	
)	
_____)	

The United States of America through Robert Tice-Raskin, Assistant United States Attorney; defendant, JONATHAN L. McDONALD, by and through his counsel, Matthew C. Bockmon, Assistant Federal Defender; and with the agreement of Glenn Simon, United States Probation Officer, agree to an order temporarily releasing Mr. McDonald from custody from March 15, 2007, through March 19, 2007, to help his wife who is scheduled for cancer surgery on March 16, 2007.

In the alternative, the parties ask the Court to hear this request for temporary release on March 16, 2007, at 10:00 a.m.

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1 Dated: March 14, 2007

2 Respectfully submitted,

3 DANIEL J. BRODERICK
4 Federal Defender

5 /s/ Matthew C. Bockmon

6 MATTHEW C. BOCKMON
7 Assistant Federal Defender
8 Attorney for Defendant
9 JONATHAN L. McDONALD

10 Dated: March 14, 2007

11 MCGREGOR W. SCOTT
12 United States Attorney

13 /s/ Robert Tice-Raskin

14 ROBERT TICE-RASKIN
15 Assistant U.S. Attorney
16 per telephonic authority

17 **O R D E R**

18 IT IS SO ORDERED, releasing Defendant JONATHAN L. McDONALD, from
19 custody from March 15, 2007, until March 19, 2007, at 2:00 p.m.
20 Defendant to self-surrender to the U.S. Marshal no later than March 19,
21 2007, at 2:00 p.m. Defendant remains subject to all terms and
22 conditions of supervision previously ordered.

23 Dated: March 14, 2007

24 /s/ Edward J. Garcia
25 EDWARD J. GARCIA
26 United States District Judge